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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

WAYLON PHILLIPS,

Plaintiff,

v.

J. OLSEN; T. KNAUFT; JOHN DOE,

Defendants.

Case No. 2:24-CV-02001-AR

MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S FIRST
REQUEST FOR PRODUCTION

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7-1(a)(1)(C), counsel for Defendants Olsen and Knauft certify that Plaintiff is an adult-in-custody not represented by counsel in this proceeding and is presently in the custody.

MOTION

Counsel for Defendants Olsen and Knauft respectfully move this Court, pursuant to Fed. R. Civ. P. 6(b), for an Order granting an extension of time of thirty 14 days, up to and including **Thursday, May 29, 2025**, within which to respond to Plaintiff's Request for Production in this

Page 1 - MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST
REQUEST FOR PRODUCTION
AK1/Int/990831652

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case. The current deadline for responding to plaintiff's Request for Production is May 15, 2025. Counsel for Defendants Olsen and Knaft need additional time to respond. Kelley decl. at ¶ 4. The information plaintiff has asked for is still in the process of being collected.

This motion is supported by the accompanying declaration of Aaron Kelley, Assistant Attorney General, and the record of the case filed herein.

DATED May 15, 2025.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Aaron D. Kelley
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Of Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on May 15, 2025, I served the foregoing DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY upon the parties hereto by the method indicated below, and addressed to the following:

Waylon Phillips
SID #12582404
Oregon State Penitentiary
2605 State Street
Salem, OR 97310

☐ HAND DELIVERY
☒ MAIL DELIVERY
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)
☐ E-MAIL

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